

Jeff G. Hammel
Direct Dial: +1.212.906.1260
jeff.hammel@lw.com

1271 Avenue of the Americas
New York, New York 10020-1401
Tel: +1.212.906.1200 Fax: +1.212.751.4864
www.lw.com

LATHAM & WATKINS LLP

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April 6, 2022

VIA ECF

The Honorable Colleen McMahon
U.S. District Court for the Southern District of New York
Daniel Patrick Moynihan U.S. Courthouse
500 Pearl Street, Room 2550
New York, NY 10007

MEMO ENDORSED

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Re: *In re Omnicom Group Inc. ERISA Litigation*, No. 1:20-cv-04141
Letter Motion for Discovery with Request for Order of Reference

Dear Judge McMahon:

We represent Defendants Omnicom Group Inc., the Board of Directors of Omnicom Group Inc., and the Administrative Committee of the Omnicom Group Retirement Savings Plan. During Plaintiffs' recent deposition testimony, Plaintiffs confirmed the existence of unproduced relevant documents in Plaintiffs' possession. Defendants have requested that Plaintiffs produce those documents imminently. Defendants are hopeful that the parties can resolve this issue without judicial intervention.

Out of an abundance of caution, however, and in light of the upcoming deadline for discovery, Defendants write pursuant to your individual practices and procedures to request an order of reference to the magistrate judge for determination of any forthcoming motion to compel discovery. Defendants intend to file any motion by Friday, April 8.

Respectfully,

/s/ Jeff G. Hammel

Jeff G. Hammel
of LATHAM & WATKINS LLP

cc: All Counsel of Record (via ECF)

4/7/2022
Refer to Magistrate
Judge for
discovery issue
if one arises
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